

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING



October 31, 2011

Mr. Kevin Lettinga, Manager Walnutdale Farms, LLC 4343 14th Street Wayland, Michigan 49348

Dear Mr. Lettinga:

SUBJECT: Concentrated Animal Feeding Operation (CAFO) Reconnaissance (Recon) Inspection

Certificate of Coverage No. MIG010063

Designated Name: Walnutdale Farms Dorr Twp-CAFO – Allegan County

On September 19, 2011, staff of the Department of Environmental Quality (DEQ), Water Resources Division (WRD) conducted a CAFO Recon at Walnutdale Farms, LLC, located at 4309 14th Street, Wayland, Allegan County. The purpose of the inspection was to evaluate the facility's compliance with Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) and National Pollutant Discharge Elimination System (NPDES) Certificate of Coverage No. MIG010063, issued on August 9, 2007, effective January 1, 2008.

Mr. Bruce Washburn (DEQ), Mr. Kevin Lettinga (Walnutdale Farms), and Mr. Aaron Odersma (Walnutdale Farms) participated in the inspection which included a review of daily water line, weekly storage structure and clean water diversion, and land application records. DEQ staff also walked around the production facility and looked at the new parlor and freestall barns. The farm's Comprehensive Nutrient Management Plan (CNMP) was reviewed prior to the inspection and a final review is pending on an updated CNMP. There was also some general discussion about the new permit.

In general, the farm appears to be appropriately managed and operated. The farm is keeping most of the required records. The farm had complete records for daily water line inspections, weekly waste storage structure and clean water diversion inspections. The farm had most of the information for the land application records, but some were incomplete. The addition of the new parlor and surrounding barns has allowed the farm to divert the rest of its clean roof runoff. The front runoff pond needed a little attention with its vegetation management around its perimeter. No surface water quality issues were noted during the inspection.

The following items were identified and/or discussed during our inspection. Please see the enclosed Post Inspection Report for all items reviewed and their rating.

1. <u>Waste Storage Structures:</u> During the inspection there was discussion about the farm meeting their Schedule of Compliance (SOC) for the waste storage structure design criteria. The structures need to meet the Natural Resources Conservation Service (NRCS) 313 Standard or its environmental equivalent. The farm was aware of this requirement and thinks that they have completed this task, however, was going to look into it. The farm's consultant sent an email on September 28, 2011, with some follow-up information. The farm may get an extension to

Mr. Kevin Lettinga, Manager Page 2 October 31, 2011

complete this if requested, but should be diligent on completing this task. Also during the inspection the vegetation around the front runoff pond was not properly maintained. The farm should take steps to ensure the vegetation management around the structure meets permit requirements.

- 2. Land Application Recording Keeping: The farm had several items for the land application records, but some of the records were unclear and appeared incomplete. This was the issue in the farm's 2010 Annual Report as well. The farm uses different record keeping forms with its field staff and then compiles it in the office. DEQ staff explained the concern and the issues with the records during the inspection. The farm is using an appropriate form in the office, but sometimes the records are not accurately transferred. DEQ staff went over this with the farm and worked out what may help to ensure accurate and complete records are kept. The farm appeared to understand what was needed and was going to implement the change. This will be evaluated with the farm's 2011 Annual Report.
- 3. <u>CNMP</u>: The farm has submitted a CNMP to this office for review and there were some deficiencies and updates that were still needed. In order to complete the farm's new permit application, a complete, up-to-date, and acceptable CNMP is needed. DEQ Staff reiterated to the farm the importance of getting the CNMP completed. The farm was in agreement with this and was going to contact their CNMP Provider. A follow-up email from their CNMP Provider was received on September 28, 2011, explaining where they were at in the process. DEQ Staff would like the completed CNMP submitted to this office **no later than December 1, 2011** so the farm can be reissued their permit in a timely manner.

Thank you for your cooperation in these matters. Should you require further information, please contact me at 269-567-3576; washburnb2@michigan.gov; or Department of Environmental Quality, Water Resources Division, 7953 Adobe Road, Kalamazoo, Michigan 49009-5026.

Sincerely,

Bruce Washburn

Kalamazoo District Office Water Resources Division

BW:DMM

Enclosure